

MEMO ENDORSED

1/11/24

BRIAN KAPLAN, P.C.

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Permission to travel
As requested herein
is granted

VIA ECF

January 10, 2024

Honorable Colleen McMahon
United States District Court
Southern District
500 Pearl Street
New York, New York 10007

Colleen McMahon

Re: U.S.A. v. Sanjay LaForest
21 Cr. 272 (CM)

Dear Judge McMahon:

As you are aware, I represent the aforementioned defendant, Sanjay LaForest. The bail conditions presently limit Mr. LaForest's travel to the Southern and Eastern Districts of New York and New Jersey. I am respectfully requesting a modification of the release order. I am hereby requesting that Mr. LaForest also be allowed to travel to Florida from January 12, 2024 to January 15, 2024 for business. Assistant United States Attorney Matthew Shahabian and Pre-Trial Services Officer Toledo have no objection to the proposed modification. ✓

Please contact me if you have any questions or concerns.

Sincerely,

Brian Kaplan
Brian Kaplan, Esq.

SO ORDERED:

Colleen McMahon
Honorable Colleen McMahon

CC: AUSA Matthew Shahabian
(Via ECF)

USDC SDNY
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DATE FILED: 1/11/24